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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

UNITED STATES OF AMERICA,

1:24-cv-00348-MO

Plaintiff,

v.

**COMPLAINT, *in rem*,
FOR FORFEITURE**

**2019 CHEVY SILVERADO 3500 LTZ
PICKUP, VIN 1GC4KXCY5KF121614,
ITS TOOLS AND APPURTENANCES,
and \$16,951.00 U.S. CURRENCY, *in
rem*,**

Defendants.

Plaintiff, United States of America, for its complaint *in rem* for forfeiture, alleges:

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to
21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendants, *in rem*, 2019 Chevy Silverado 3500 LTZ Pickup, (“**Defendant Truck**”) and

\$16,951.00 U.S. Currency, (“**Defendant Currency**”), were seized in the District of Oregon, and are now and during the pendency of this action will be within the jurisdiction of this Court.

III.

Defendants, *in rem*, **Defendant Truck** and **Defendant Currency**, represent proceeds traceable to an exchange for controlled substances or were used or intended to be used to facilitate such a transaction in violation of 21 U.S.C. § 841(a)(1), and are forfeitable to the United States pursuant to the provisions of 21 U.S.C. § 881(a)(4) and (6), as more particularly set forth in the declaration of Wesley Ellis, Special Agent, Department of Homeland Security, Homeland Security Investigations, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, plaintiff, United States of America, prays that due process issue to enforce the forfeiture of defendants, *in rem*, **Defendant Truck** and **Defendant Currency**; that due notice be given to all interested persons to appear and show cause why forfeiture of these defendants, *in rem*, should not be decreed; that due proceedings be had thereon; that these defendants be forfeited to the United States; that the plaintiff United States of America be awarded its costs and disbursements incurred in this action.

DATED: February 26, 2024.

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

s/ Judith R. Harper
JUDITH R. HARPER
Assistant United States Attorney

VERIFICATION

I, Wesley Ellis, declare under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

s/ Wesley Ellis
WESLEY ELLIS
Special Agent
Homeland Security Investigations